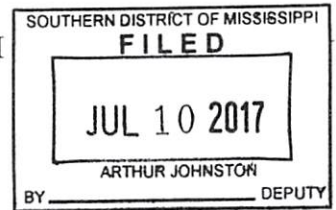


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



SCOTT AND JENNIFER BERRY, INDIVIDUALLY  
AND ON BEHALF OF THE MINOR CHILDREN  
C.W.B, RLC, C.C, AND A.A.D, AND C.D.B  
PLANTIFF(S)

VS.

Civil Action No. 1:17cv81-HSO- JCG

FELEE' SIMMS, INDIVIDUALLY AND AS AN AGENT  
FOR MISSISSIPPI DEPARTMENT  
OF HUMAN SERVICES  
AND JOHN AND JANE DOES 1-10  
DEFENDANT(S)

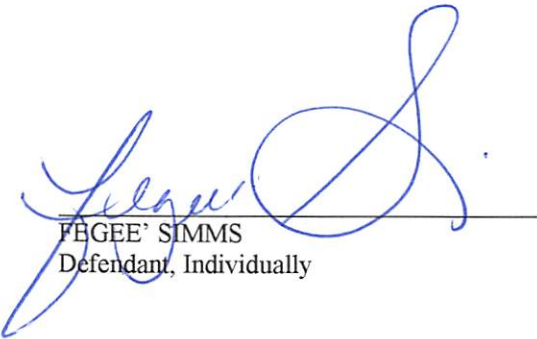
MOTION TO DISMISS

Now comes the Defendant, Feelee' Simms, as an individual to moves the court to dismiss the caption complaint against her. In support, the individual defendant assert as follows:

1. Action because it appears on the face of the complaint and from the allegations that the claim set up in the complaint did not accrue, if it accrued at all, to plaintiff within two years before the bringing of this action, and therefore the action is barred by Mississippi Code 15-1-36.
2. Some or all of the claims are barred by the State of Mississippi's sovereign immunity and/or the defendant's legislative or absolute immunity.
3. The complaint fails to state a claim on which relief can be granted.

Wherefore, the individual defendant, moves this court to dismiss the complaint against her with prejudice and with costs.

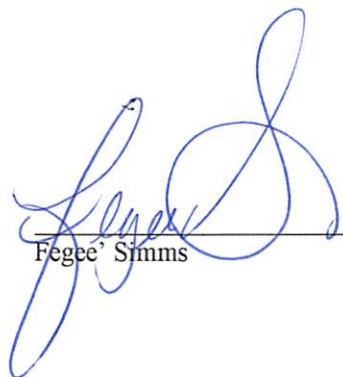
Respectfully submitted, this the 10 day of July, 2017.

  
FELEE' SIMMS  
Defendant, Individually

CERTIFICATE OF SERVICE

I hereby certify that on the 10 day of July, 2017, I delivered a true and correct copy of the foregoing Defendant's Motion to Dismiss via hand delivery to:

Edward Gibson  
153 Main St.  
Bay St. Louis, Mississippi 39520  
Tel: (228) 467-4225



Fegee Simms